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ANTHONY J. SIANO

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MEMO ENDORSED

June 14, 2012

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By E-Mail

Honorable Colleen McMahon
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Annabi and Jereis, 10 CR 007 (CM)

Dear Judge McMahon:

I am counsel to the defendant Zehy Jereis, in the above captioned case.

I am writing to ask the Court to extend the motion schedule in this case for five days. I am making this request because my office had had to file briefs and motion papers in the Appellate Division in two matter in the last several weeks and two members of my staff are dealing with family health issues. These time demands have prevented us from finishing our papers in the Jereis case by Monday.

All parties consent to extend defendants' time to make motions from June 18, 2012, to June 22, 2012 and to extend the other due dates for answers and replies an identical period thereafter.

Mr. Sapone joins in this request and the Office of the United States Attorney consents to the Court granting this application.

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Thank you for your time and attention to this matter.

Respectfully submitted,



Anthony J. Blano

cc: Edward Sapone, Esq. (by facsimile)
Assistant United States Attorney Perry Carbone (by facsimile)
Assistant United States Attorney Jason Halperin (by facsimile)